

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANACLETO APOLINAR, on behalf of himself and all
other persons similarly situated,

Docket No.: 24-cv-05304 (JGK)

Plaintiff,

-against-

TAQUERIA SAINT MARKS PLACE INC.,
PHILLIP BARRAZA and ANDREA BARRAZA,

Defendants.

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**NOTICE OF MOTION OF THE ROMERO LAW GROUP PLLC TO WITHDRAW AS
COUNSEL OF RECORD FOR PLAINTIFF**

PLEASE TAKE NOTICE that, upon the Declaration of David D. Barnhorn, Esq. in Support of Motion of the Romero Law Group PLLC to Withdraw as Counsel of Record for Plaintiff with Legal Authority, dated January 29, 2025, and all the pleadings and proceedings heretofore had herein, the Romero Law Group PLLC will move this Court at the United States Courthouse, Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, on a date and time to be designated by the Court, for an Order pursuant to Local Rule 1.4 granting the Romero Law Group PLLC's Motion to Withdraw as Counsel of Record for Plaintiff.

Please take further notice that, pursuant to Local Rule 6.1(b), opposition papers, if any, are due by February 12, 2025, and reply papers, if any, are due by February 19, 2025.

Dated: Hauppauge, New York
January 29, 2025

ROMERO LAW GROUP PLLC
Attorneys for Plaintiff
490 Wheeler Road, Suite 277
Hauppauge, New York 11788
Tel.: (631) 257-5588



By: _____

DAVID D. BARNHORN, ESQ.
PETER A. ROMERO, ESQ.

CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2025, a true and correct copy of the foregoing *Notice of Motion of the Romero Law Group PLLC to Withdraw as Counsel of Record for Plaintiff and Declaration of David D. Barnhorn, Esq. in Support of Motion of the Romero Law Group PLLC to Withdraw as Counsel of Record for Plaintiff with Legal Authority* was served via First Class Mail and Electronic Mail to Plaintiff, at the following addresses:

Anacleto Apolinar
114 East 168th Street
Bronx, New York 10452
Email: Anacletoapolinar2004@gmail.com



DAVID D. BARNHORN, ESQ.